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From: Dunbar, Bill
Sent: Wed 6/1/2016 12:02:28 AM
Subject: EPA comments to Corps on Donlin Creek Gold Mine
[Donlin DEIS Comment Letter - FINAL.pdf](#)
[Donlin 3a Comment Letter 05-31-2016.pdf](#)

Jim – I hope this email finds you doing well. You have your hands full!

Attached are the EPA letters to the Army Corps regarding the Donlin Creek Gold Mine draft EIS and Clean Water Act Section 404 permit.

Donlin is an important project, and we've been working very closely with the company and state and federal agencies as the it has been developed. Despite this excellent relationship, in general, we found that both documents lacked sufficient information to make an informed and meaningful review of the proposed project.

Regarding the draft EIS, we are concerned that it does not include a Health Impact Assessment (HIA), which we understand the Alaska Department of Health and Social Services is developing. We are concerned that the health information in the draft EIS may be inconsistent with the findings of the state's HIA. Our letter recommends that the state's draft HIA be distributed for review and comment and that public outreach be provided to the local communities regarding the results of the HIA. The letter recommends that the publicly reviewed and, if necessary, revised HIA be incorporated into the EIS.

On the 404 permit, the insufficient information in the draft EIS surrounding impacts to aquatic resources makes public and agency review of the Corps' permitting public notice premature at this time.

The applicant is in the process of addressing these data gaps, and if the information had been available during the review period for the Public Notice and the DEIS, the cooperating agencies and the public would have been able to participate in a more meaningful review of the project, based on complete information.

To preserve EPA's ability to participate in the permitting process, EPA is invoking the dispute resolution process established by the 1992 Memorandum of Agreement ("404(q) MOA") between the agencies regarding permit issuance procedures.

Of course, I've only touched on things a bit here. Needless to say, there's more to all this, so please let me know if you, the Lieutenant Governor and/or the Governor would like to discuss these issues further.

Best – Bill.

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